

*Mary Ann McBride, et al v. MDOC, et al.*

USDC-ED No: 2:15-cv-11222

Honorable Sean F. Cox

Magistrate Judge David R. Grand

## **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

MARY ANN MCBRIDE, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	Civil Action No. 2:15-cv-11222
v.	)	
	)	Hon. Sean F. Cox
MICHIGAN DEPARTMENT	)	Mag. David R. Grand
OF CORRECTIONS, et al.,	)	
	)	
<i>Defendants.</i>	)	
	)	

**PLAINTIFFS' NOTICE OF DEPOSITION OF HEIDI WASHINGTON**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30, Plaintiffs Mary Ann McBride, Brian Wittman, and Ralph Williams (collectively "Plaintiffs"), through its undersigned attorneys, will conduct the deposition of Heidi Washington, the Director of Defendant Michigan Department of Corrections ("MDOC"), at Michigan Protection & Advocacy Service, Inc., 4095 Legacy Pkwy, Ste. 500, Lansing, MI 48911, (517) 487-1755, or at some other place to be mutually agreed upon by counsel. The deposition will occur before a Notary Public, court reporter, or any other person qualified to administer an oath, and will be recorded by stenographic, sound, video, audiovisual, and/or any other such appropriate means. The deposition will commence at **9:00 am** on **May 20, 2016**, and will continue up to seven hours, as permitted by the Federal Rules of Civil Procedure 30(d).

Dated: April 19, 2016

/s/ Stephen C. Bartenstein  
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**CERTIFICATE OF SERVICE**

I hereby certify that Notice of Deposition of Heidi Washington was served by electronic mail on April 19, 2016 to:

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